

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

PETER A. CRAWFORD,

Plaintiff,

v.

Civil Action No.
05-cv-10078 (DPW)

WOLVERINE, PROCTOR & SCHWARTZ, INC.;
STEVEN F. CHILINSKI, and
DEEPAK S. KULKARNI,

Defendants.

SUGGESTION OF BANKRUPTCY

NOW COMES Defendants Wolverine, Proctor & Schwartz, Inc. ("WPS Inc."), Steven F. Chilinski and Deepak S. Kulkarni, defendants in the above-captioned action, and suggest on the record that on April 1, 2006, Wolverine, Proctor & Schwartz, LLC (the successor in interest to WPS Inc. with respect to any liability that could result against WPS Inc. in the instant action) filed a Chapter 7 bankruptcy petition in the United States Bankruptcy Court for the District of Massachusetts, Docket No. 06-10815. [A copy of the Notice of Chapter 7 Bankruptcy Case, which was sent to the undersigned by the counsel for the debtor, is attached hereto as Exhibit A.]

Defendants respectfully request that the Court enter an order to stay all further action in this case pursuant to 11 U.S.C. § 362(a).

Dated: April 10, 2006

Respectfully submitted,

WOLVERINE, PROCTOR & SCHWARTZ, INC.,
STEVEN F. CHILINSKI, and
DEEPAK S. KULKARNI

By their attorneys,

/s/ Mark M. Whitney
Mark Whitney (BBO #637054)
Jeffrey D. Kuhn
MORGAN, BROWN & JOY, LLP
200 State Street
Boston, Massachusetts 02109
(617) 523-6666
mwhitney@morganbrown.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 10, 2006, I filed the foregoing document with the Clerk of the Court by using the ECF system and served an electronic copy upon the plaintiff by email. I further certify that I mailed the foregoing document and the notice of electronic filing to the pro se plaintiff, Peter A. Crawford, 23 Newcastle Drive, #11, Nashua, NH 03060, by U.S. mail, on April 10, 2006.

/s/ Mark M. Whitney
Mark M. Whitney, Esq.

FORM B9D (Chapter 7 Corporation/Partnership Asset Case) (10/05)

Case Number 06-10815

UNITED STATES BANKRUPTCY COURT

District of Massachusetts

Notice of Chapter 7 Bankruptcy Case, Meeting of Creditors, & Deadlines

A chapter 7 bankruptcy case concerning the debtor Corporation listed below was filed on 4/1/06.

You may be a creditor of the debtor. **This notice lists important deadlines.** You may want to consult an attorney to protect your rights. All documents filed in the case may be inspected at the bankruptcy clerk's office at the address listed below. NOTE: The staff of the bankruptcy clerk's office cannot give legal advice.

See Reverse Side For Important Explanations

Debtor(s) (name(s) used by the debtor(s) in the last 8 years, including married, maiden, trade, and address):

Wolverine Proctor & Schwartz, LLC
51 E. Main Street
Merrimac, MA 01860

Case Number:
06-10815

Taxpayer ID/Employer ID/Other Nos.:
14-1918705

Attorney for Debtor(s) (name and address):

Annapoorni Sankaran
Greenberg Traurig LLP
One International Place
20th Floor
Boston, MA 02110
Telephone number: (617) 310-6000

Bankruptcy Trustee (name and address):

Lynne F. Riley
Riley & Esher
100 Franklin Street
Boston, MA 02110
Telephone number: 617-399-7300

Meeting of Creditors

Date: **May 2, 2006**

Time: **09:30 AM**

Location: **Thomas P. O'Neill Federal Bldg, 10 Causeway Street, Room 255-B, Boston, MA 02222**

Deadlines to File a Proof of Claim

Proof of Claim must be *received* by the bankruptcy clerk's office by the following deadline:

For all creditors (except a governmental unit): **7/31/06**

For a governmental unit: **180 Days from the date the petition was filed.**

Foreign Creditors

A creditor to whom this notice is sent at a foreign address should read the information under "Claims" on the reverse side.

Creditors May Not Take Certain Actions:

In most instances, the filing of the bankruptcy case automatically stays certain collection and other actions against the debtor and the debtor's property. Under certain circumstances, the stay may be limited to 30 days or not exist at all, although the debtor can request the court to extend or impose a stay. If you attempt to collect a debt or take other action in violation of the Bankruptcy Code, you may be penalized. Consult a lawyer to determine your rights in this case.

Address of the Bankruptcy Clerk's Office:

U. S. Bankruptcy Court
10 Causeway Street
Room 1101
Boston, MA 02222
Telephone number: 617-565-6054

For the Court:

Clerk of the Bankruptcy Court:
James M. Lynch

Hours Open: Monday – Friday 8:30 AM – 5:00 PM

Date: 4/5/06

FRI-19607005656032
Case 4:05-cv-10078-DPW
Annapoorni Sankaran
Greenberg Traurig LLP
One International Place
20th Floor
Boston, MA 02110

Document 87-2

Filed 04/11/2006

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